

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
<b>LASHELIA EATON-JACOBS</b>	:	<b>VIOLATIONS:</b>
	:	18 U.S.C. § 371 (conspiracy – 1 count)
	:	18 U.S.C. § 924(a)(1)(A) (making false
	:	statements to a federal firearms licensee –
	:	2 counts)

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this information:

1. Perry's Gun Shop, in Wendell, North Carolina, possessed a federal firearms license ("FFL") and was authorized to deal in firearms under federal laws.
2. FFL holders are licensed, among other things, to sell firearms and ammunition. Various rules and regulations, promulgated under the authority of Chapter 44, Title 18, United States Code, govern the manner in which FFL holders are permitted to sell firearms and ammunition.
3. The rules and regulations governing FFL holders require that a person seeking to purchase a firearm fill out a Firearm Transaction Record, ATF Form 4473 ("Form 4473"). Part of the Form 4473 requires that the prospective purchaser certify that all his or her answers on Form 4473 are true and correct. Question 21.a. of the Form 4473 requires that the prospective purchaser certify truthfully, subject to penalties of perjury, that he or she is the actual

buyer of the firearm. The Form 4473 contains the following language in bold type: **“Warning: You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you.”** In the certification section of the Form 4473, the actual buyer must certify that his or her answers to the questions on the form are “true, correct, and complete,” and acknowledge by his or her signature that “making any false oral or written statement . . . is a crime punishable as a felony under Federal law, and may also violate State and/or local law.”

4. FFL holders are required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, to ensure that the person was not prohibited from purchasing a firearm. For example, convicted felons are persons prohibited by law from buying firearms.

5. A person who purchases a firearm at the behest of another person and falsely states on the Form 4473 that he or she is the actual buyer of the firearm is known as a “straw purchaser.”

6. From on or about February 24, 2021 through on or about February 27, 2021, in Wendell, in the Eastern District of North Carolina, Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**LASHELIA EATON-JACOBS**

conspired and agreed, together with Tyrone Patterson and Junious Flemming, both charged elsewhere, to commit an offense against the United States, that is, to make a false statement with respect to the information required to be kept in the records of a federally licensed firearms dealer, in violation of Title 18, United States Code, Section 924(a)(1)(A).

### **MANNER AND MEANS**

It was part of the conspiracy that:

7. Defendant LASHELIA EATON-JACOBS used money provided by Tyrone Patterson and Junious Flemming to purchase firearms for them from Perry's Gun Shop. Defendant EATON-JACOBS purchased firearms with money supplied Patterson and Flemming, and when doing so, falsely stated on the Form 4473 that she completed for the purchase that she was the actual purchaser of the firearms, when in fact she knew she was purchasing the firearms for Patterson and Flemming.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its object, the following overt acts, among others, were committed in the Eastern District of North Carolina and elsewhere:

1. On or about February 24, 2021:

a. Defendant LASHELIA EATON-JACOBS went to Perry's Gun Shop in Wendell, North Carolina and purchased the following firearms for Tyrone Patterson: a Taurus, Model G3, 9mm semi-automatic pistol, bearing serial number ACA439243; a Taurus, Model G3, 9mm semi-automatic pistol, bearing serial number ACA439526; a Taurus, Model G3, 9mm semi-automatic pistol, bearing serial number ACA439785; a Taurus, Model G3, 9mm semi-automatic pistol, bearing serial number ACA439773; and a Taurus, Model G3, 9mm semi-automatic pistol, bearing serial number ACA395925.

b. Defendant EATON-JACOBS used money supplied by Tyrone Patterson and Junious Flemming to purchase the firearms.

c. Defendant EATON-JACOBS gave these firearms to Tyrone Patterson knowing that he planned to deliver them to Junious Flemming.

2. On or about February 27, 2021:

a. Defendant LASHelia EATON-JACOBS went to Perry's Gun Shop in Wendell, North Carolina and purchased the following firearms for Tyrone Patterson: a Taurus, Model G3, 9mm semi-automatic pistol, bearing serial number ACA439551; and a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number ACA442142.

b. Defendant EATON-JACOBS used money supplied by Tyrone Patterson and Junious Flemming to purchase the firearms.

c. Defendant EATON-JACOBS gave these firearms to Tyrone Patterson who transported them to Philadelphia.

All in violation of Title 18, United States Code, Section 371.



**COUNTS TWO AND THREE****THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 5 and 7, and Overt Acts 1 and 2 of Count One are incorporated herein.
2. On or about the dates listed below, each date constituting a separate count of this information, in Wendell, in the Eastern District of North Carolina, defendant

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in connection with the acquisition of each of the firearms listed below from the FFL holder listed below, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the FFL holder's records, in that defendant EATON-JACOBS falsely certified on the Form 4473, Firearms Transaction Record, that she was the actual purchaser of the firearms listed on the Form 4473, when in fact defendant EATON-JACOBS knew this statement was false and fictitious, in that EATON-JACOBS knew she was purchasing the each firearm for Tyrone Patterson and Junious Flemming, both charged elsewhere.

Count	Date	FFL Holder and Sale Location	Firearms	Serial Number
Two	February 24, 2021	Perry's Gun Shop (Wendell, North Carolina)	Taurus, Model G3, 9mm semi-automatic pistol	ACA439243
			Taurus, Model G3, 9mm semi-automatic pistol	ACA439526
			Taurus, Model G3, 9mm semi-automatic pistol	ACA439785

			Taurus, Model G3, 9mm semi-automatic pistol	ACA439773
			Taurus, Model G3, 9mm semi-automatic pistol	ACA395925
Three	February 27, 2021	Perry's Gun Shop (Wendell, North Carolina)	Taurus, Model G3, 9mm semi-automatic pistol	ACA439551
			Taurus, Model G2C, 9mm semi-automatic pistol	ACA442142

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

  
**JENNIFER ARBITTIER WILLIAMS**  
 Acting United States Attorney